

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RENALDO WHITE and RANDOLPH
NADEAU, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

SYMETRA ASSIGNED BENEFITS SERVICE
COMPANY and SYMETRA LIFE
INSURANCE COMPANY,

Defendants.

No. 2:20-cv-01866-MJP

**STIPULATED MOTION TO EXTEND
CERTAIN DEADLINES**

**NOTE ON MOTION CALENDAR:
September 8, 2021**

The parties, by and through their counsel, hereby submit the following stipulated motion and respectfully request the Court's approval of the same, to adjust the schedule for completion of class certification discovery and the briefing of Plaintiffs' motion for class certification.

Briefing regarding Defendants' Motion to Dismiss closed on May 14, 2021; this motion was denied by the Court on August 5, 2021, Dkt. # 44. Defendants' answer was thereafter due on August 19, 2021; this date has been extended to September 9, 2021. Dkt. # 50. Pursuant to the Court's May 12, 2021 Order, Dkt. # 37, Plaintiffs' motion for class certification is presently due on October 4, 2021, less than 30 days following Defendants' answer.

The parties have been working diligently to complete class certification discovery. Plaintiffs served their first set of discovery May 19, 2021; Defendants served discovery to

STIPULATED MOTION TO EXTEND
CERTAIN DEADLINES - 1
(2:20-cv-01866-MJP)

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1 Plaintiffs on August 19, 2021. The parties have met and conferred numerous times regarding
 2 discovery over the course of the summer and, at present, are finalizing their discussions
 3 regarding Defendants' ESI production and interrogatory responses.

4 The requested extensions are supported by good cause. The extensions are necessary to
 5 permit the completion of Defendants' ESI productions as relevant to class certification and, in
 6 turn, to provide Plaintiffs with an opportunity to review the same prior to seeking certification of
 7 the class. The requested extensions will not interfere with other deadlines in this case. This is the
 8 first request for extension of these deadlines.

9 **STIPULATED MOTION**

10 The parties agree and request that the Court extend the current class certification
 11 discovery deadline to October 15, 2021. The parties propose the following briefing schedule for
 12 Plaintiffs' Motion for Class Certification and respectfully request that the Court enter the same:

- 13 • November 12, 2021: Plaintiffs' Motion for Class Certification
- 14 • December 10, 2021: Defendants' Opposition
- 15 • December 23, 2021: Plaintiffs' Reply

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 18 DATED this 8th day of September, 2021.

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17 *Attorneys for Plaintiffs*

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19 IT IS SO ORDERED.

20 Dated this 9th day of September, 2021.

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24 Marsha J. Pechman
25 United States District Judge
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